

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS

DAMILARE SONOIKI,

Plaintiff,

v.

HARVARD UNIVERSITY, et al.,

Defendants.

Civil Action No. 1:19-cv-12172-LTS

**DECLARATION OF ANNA E. BULLOCK IN OPPOSITION TO DEFENDANTS’  
MOTION FOR SUMMARY JUDGMENT**

I, Anna E. Bullock, declare:

1. I am an associate at the law firm of Kohrman Jackson & Krantz LLP, and I am one of the attorneys of record for Plaintiff, Damilare Sonoiki.

2. I am licensed to practice law in the State of Ohio and was admitted *pro hac vice* in this matter.

3. I am familiar with the facts set forth below and would be able to testify to them based on my personal knowledge or review of the records and files maintained by this firm in the course of its representation of Plaintiff in this case.

4. Exhibit 1, attached hereto, is a true and correct copy of a [REDACTED]

[REDACTED]  
[REDACTED] and is filed under seal.

5. Exhibit 2, attached hereto, is a true and correct copy of the June 25, 2013, [REDACTED]

[REDACTED]  
[REDACTED] and is filed under seal.

6. Exhibit 3, attached hereto, is a true and correct copy of the November 19, 2013, Ad Board Subcommittee Report regarding Ann that Harvard produced in this litigation as Bates No. HU-DS-0002145-0002167.

7. Exhibit 4, attached hereto, is a true and correct copy of the [REDACTED]

[REDACTED]  
[REDACTED] and is filed under seal.

8. Exhibit 5, attached hereto, is a true and correct copy of a [REDACTED]

[REDACTED]  
9. Exhibit 6, attached hereto, is a true and correct copy of: Carmen DeNavas-Walt and Bernadette D. Proctor, *Income and Poverty in the United States: 2014*, Current Population and Reports, United States Census Bureau, issued September 2015.

10. Exhibit 7, attached hereto, is a true and correct copy of an [REDACTED]

[REDACTED]  
[REDACTED] and is filed under seal.

11. Exhibit 8, attached hereto, is a true and correct copy of a text message exchange between Mr. Sonoiki and [REDACTED] in December 2019 that was produced by Mr. Sonoiki in this litigation as Bates No. SONOIKI 000897 and is filed under seal.

12. Exhibit 9, attached hereto, is a true and correct copy of excerpts from the December 7, 2022 deposition of John L. Ellison and is filed under seal.

13. Exhibit 10, attached hereto, is a true and correct copy of excerpts from the December 8, 2022 deposition of Laura K. Johnson and is filed under seal.

14. Exhibit 11, attached hereto, is a true and correct copy of excerpts from the December 16, 2022 deposition of Harvard's corporate representative, Michael Burke, and is filed under seal.

15. Exhibit 12, attached hereto, is a true and correct copy of excerpts from the January 11, 2023 deposition of Mr. Sonoiki and is filed under seal.

16. Exhibit 13, attached hereto, is a true and correct copy of the, February 20, 2023, expert report of Mr. Steve Shedlin, expert for Plaintiff and is filed under seal.

17. Exhibit 14, attached hereto, is a true and correct copy of the February 24, 2023, expert report and related materials of Mr. Chad Staller, expert for Plaintiff and is filed under seal.

18. Exhibit 15, attached hereto, is a true and correct copy of excerpts from the March 29, 2023 deposition of Steven D. Shedlin and is filed under seal.

19. Exhibit 16, attached hereto, is a true and correct copy of the June 27, 2023, Declaration of Plaintiff Damilare Sonoiki and is filed under seal.

20. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2023, in Cleveland, Ohio.

/s/ Anna E. Bullock  
Anna E. Bullock

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true copy of the above document upon all parties with an interest in this matter by electronically filing it through this Court's CM/ECF filing system on June 28, 2023.

/s/ Anna E. Bullock  
ANNA E. BULLOCK (*pro hac vice*)